## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS

## BEAUMONT DIVISION

UNITED STATES OF AMERICA \$

VS. \$ CR. NO. 1:12-CR-29

\$

JERRY TREVINO \$

## **DEFENSE PURPOSED JURY INSTRUCTION**

In addition to the Jury Instructions that have been agreed upon with the Government, the defense request the following jury instruction:

## 1.16 WITNESS'S USE OF ADDICTIVE DRUGS

The testimony of someone who is shown to have used addictive drugs during the period of time about which the witness testified must always be examined and weighed by the jury with greater care and caution than the testimony of ordinary witnesses.

You should never convict any defendant upon the unsupported testimony of such a witness unless you believe that testimony beyond a reasonable doubt.